

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Greenbelt Division)

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|------------------------------------|---|-----------------------|
| RUDOLPH J. GEIST , <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| HISPANIC INFORMATION & |) | Case No. 8:16-cv-3630 |
| TELECOMMUNICATIONS NETWORK, |) | |
| INC., |) | |
| |) | |
| Defendant. |) | |
| |) | |

JOINT MOTION TO MODIFY THE COURT'S SCHEDULING ORDER

Plaintiffs Rudolph J. Geist, RJGLaw LLC, and RJGLaw LLC, and Defendant Hispanic Information and Telecommunications Network Inc. (collectively, the "Parties") by and through their undersigned counsel, hereby jointly move the Court to modify the Amended Scheduling Order in the Initial Joint Status Report (ECF 55), as adopted by this Court (ECF 57) (the "Order").

Requests for Modifications

Since the date of the Order, the Parties have worked diligently to complete discovery. The Parties have exchanged numerous letters with one another addressing issues that have arisen during discovery in an effort to amicably resolve such issues without judicial intervention. While those issues have been progressively narrowed, various issues remain that the Parties are continuing to work to resolve.

Moreover, the month of September contains numerous Jewish holidays that Defendant's counsel observes. These holidays limit the number of available days for the Parties to travel and conduct depositions.

Further, the Parties have agreed to participate in mediation on September 17, 2018, in the hopes of mutually and efficiently resolving the issues in this case.

Accordingly, the Parties jointly request the following modifications to the deadlines set forth in the Order (dates in brackets reflect the deadlines set forth in the Order):

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| June 29, 2018 | Motion to amend the pleadings or for joinder of additional parties |
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| August 6, 2018* [July 16, 2018] | Document production substantially completed |
| October 12, 2018* [August 17, 2018] | Fact depositions completed |
| October 5, 2018 [August 20, 2018] | Plaintiffs' Rule 26(a)(2) expert disclosures |
| November 2, 2018 [September 21, 2018] | Defendant's Rule 26(a)(2) disclosures |
| November 16, 2018 [October 5, 2018] | Plaintiffs' rebuttal Rule 26(a)(2) |
| November 30, 2018 [October 31, 2018] | Rule 26(a)(2) supplementation of disclosures and responses |
| November 30, 2018* [October 31, 2018] | Expert depositions completed |
| November 30, 2018 [October 31, 2018] | Completion of Discovery; submission of Post-Discovery Joint Status Report |
| December 6, 2018 [November 7, 2018] | Requests for admissions |
| January 8, 2018 [November 30, 2018] | Dispositive pretrial motions |

Conclusion

The Parties believe such an adjustment is warranted considering the need to coordinate and obtain electronic and other discovery from the parties and certain third parties, as well as other needs of the case, and accordingly respectfully request that this Court modify the Order as indicated above.

Dated: August 20, 2018

By: /s/ Benjamin G. Chew
Benjamin G. Chew (D. Md. Bar No. 14985)
BROWN RUDNICK
601 Thirteenth Street, N.W.

* The Parties have included a deadline for this event although none is required by the Order in order to ensure the timely and efficient completion of discovery, but respectfully request permission to modify this deadline by agreement and without leave of Court.

Suite 600
Washington, D.C. 20005
Telephone: (202) 536-1700
Facsimile: (202) 536-1701
Email: bchew@brownrudnick.com

*Counsel for Plaintiffs Rudolph J. Geist and
RJG Law LLC and RJG LAW LLC*

By: /s/ Isaac Nesser
Isaac Nesser
QUINN EMANUEL URQUHART & SULLIVAN,
LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
Email: isaacnesser@quinnemanuel.com

/s/ William Pittard
William Pittard, D. Md. Bar No. 16155
KAISER DILLON PLLC
1401 K Street, NW, Suite 600
Washington, DC 20005
Telephone: (202) 683-6150
Facsimile: (202) 280-1034
Email: wpittard@kaiserdillon.com

*Counsel for Hispanic Information and
Telecommunications Network, Inc.*